

Disclosure as to Expert Witness Zuhair Jumaah Al Maliki

I. Statement of Opinions, Basis, and Reasons

The following is "a complete statement of all opinions that the government will elicit from the witness in its case in chief, or during its rebuttal to counter testimony that the defendant has timely disclosed under [Rule 16(b)(1)(C), and the bases and reasons for them." Fed. R. Crim. P. 16(a)(1)(G)(iii).

The Government expects Zuhair Jumaah Al-Maliki to testify that in 2015: (1) torture was illegal under the Iraqi Constitution; (2) torture was illegal under Iraqi criminal statutes; and (3) unlawful detention was illegal in Iraq and detention was lawful only if authorized by a judicial proceeding and had to have been in a lawful place for detention. In addition, Mr. Al-Maliki may testify as to whether certain actions described to him would constitute torture under Iraqi law.

II. Qualifications

The attached CV lists "the witness's qualifications, including a list of all publications authored in the previous 10 years." Fed. R. Crim. P. 16(a)(1)(G)(iii):

III. List of Cases

The witness has not testified during the previous four years as an expert at trial or by deposition. Fed. R. Crim. P. 16(a)(1)(G)(iii):

Respectfully submitted,

04.3.2023


Zuhair Jumaah Al-Maliki

